Please note Area code changed to 973

OXFORD ENVIRONMENTAL, INC.

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February 19, 1998

U.S. Environmental Protection Agency, Region II
Removal Action Branch
2790 Woodbridge Avenue
Edison, NJ 08837

Attn: Mr. Eric Wilson, On-Scene Coordinator

Re: Site Summary Report
Cornell-Dubilier Electronics Site
South Plainfield, New Jersey
EPA Order Index No. II-CERCLA-97-109

Dear Mr. Wilson:

Oxford Environmental, Inc. (Oxford) respectfully submits the attached Site Summary Report on behalf of our client, DSC of Newark Enterprises, Inc.

The report summarizes the actions taken to stabilize the site under the Site Operations Plan. Basically the actions consisted of paving unpaved parking lots and driveways on the site, erecting fences to prevent pedestrian traffic, and installing soil erosion and sediment controls.

It is our understanding that the submission of this SOP constitutes compliance with the directives of the Administrative Order II-CERCLA-97-109 issued to DSC of Newark Enterprises, Inc.

If you have any questions or concerns, or if we may be of any assistance to you on this matter, please feel free to contact the undersigned.

Very truly yours,

John Hendry
Facility Coordinator
Vice President

Gary T. Boyer, P.E., DEE
Sr. Environmental Engineer
Project Engineer

attachment

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TABLES

FIGURES

DRAWINGS (24" X 36")

1. CERTIFICATION

To the best of my knowledge, after thorough investigation, I certify that the information contained in and accompanying this submission is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature 2/24/98 Date

Lara Coraci Name (typed or printed) Assistant to the President Title

DSC of Newark Enterprises, Inc.

2. SYNOPSIS OF WORK PERFORMED

The following sections provide information on the Site's history as well as work completed during stabilization activities. Sections have been broken down into general tasks with the exception of areas and/or activities not originally detailed in the Site Operations plan.

2.1 BACKGROUND

The following excerpt is taken from the May, 1997, Superfund Update by EPA Region 2:

The Cornell-Dubilier Site is located at 333 Hamilton Boulevard in South Plainfield, New Jersey. The Site occupies approximately 25 acres and is bounded by Hamilton Boulevard to the northwest, Spicer Avenue to the southwest, a wetlands area to the southeast, the Bound Brook and Conrail tracks to the northeast.

Cornell-Dubilier operated at the Site from 1936 to 1962, manufacturing electronic components, especially capacitors for correcting power factor. During that period of time, Cornell-Dubilier handled and may have disposed of or arranged for the disposal of PCBs at the Site. The Site is currently known as the Hamilton Industrial Park and is occupied by 15 businesses.

Sampling conducted by EPA has revealed the presence of a wide variety of contaminants including PCB's, lead and cadmium in soils at the Site and in the water and sediment of the Bound Brook that borders the Site. PCBs are the primary contaminant of concern at the Site due to the levels found in soils and the potential health effects from long-term exposure.

EPA initiated a study to determine the impacts of contamination of the Bound Brook on the surrounding community. The goals of this study are to provide the data necessary to determine the extent of contamination in the Bound Brook; evaluate potential threats to public health; and evaluate potential threats to wildlife in the stream corridor.

Under Superfund, EPA can respond to a release or the threat of a release of hazardous substances by conducting a removal action or requiring responsible parties to conduct a removal action. Removal actions are short-term operations to reduce or eliminate the threats to public health or the environment associated with the release of hazardous substances.

Responsible parties under Superfund include current and former owners or operators of the facility. EPA notified the current property owner and a past operator of their potential liability for the Site.

EPA issued an Order to the property owner to stabilize the Site. This Order requires that the owner take actions to limit access to areas of known PCB contamination, limit the migration of contaminants off-site to the stream which borders the Site and pave driveways and parking areas within the industrial park.

This Site Summary Report covers the actions undertaken to stabilize the site. These actions included fencing and the posting of warning signs, paving of driveways and parking areas, and installation of soil erosion and sediment controls.

2.2 NOTIFICATIONS

As required by the Site Operations Plan, which was approved on June 11, 1997, U.S. EPA was notified of the work a minimum of 48 hours prior to the beginning of onsite operations.

Local authorities were also notified of plans for the site. The municipal engineer, in a letter dated June 20, 1997, suggested that 4 inches of stabilized base rather than three inches be used. However, based on input from experienced paving contractors, three inches was kept as the specification.

Tenants in the industrial park were also notified of the progress of the work. The first written notice to all affected tenants was July 7, 1997. Subsequent notices were given by personal contact from the contractor or from the DSC representatives on site.

2.3 BIDDING AND ENGAGING A CONTRACTOR

After approval of the Site Operations Plan, bids were solicited for the work, and a contractor was selected. However, after selection, the contractor became unable to perform the work. Consequently, a new contractor, Bellamy Brothers Paving, of Middlesex, New Jersey, was retained. Table 1 shows a complete list of the contractors and subcontractors used on the project.

2.4 PAVING OF DRIVEWAYS AND PARKING AREAS

As shown on the as-built layout, almost all unpaved driveways and parking areas in the industrial park on the property were paved. The exceptions are loading ramps by Building 5 and Building 10. The areas were covered with 1 ½ inch clean stone to allow percolation of rain into the ground. The areas at Building 5 did not require a sump pump. The area at Building 10 did require a sump pump to alleviate standing

water problems. The pump discharges to piping leading across the paved drive into a natural depression.

The paving proceeded in stages, in order to allow tenants to maintain their business operations. Typically, an exclusion zone was established for a section of the property, using traffic barrels, caution tape, and snow fence. The contractor provided a security patrol to maintain control of the exclusion zone.

After establishing an exclusion zone, unsuitable material, such as weeds or soft soil, were cleared. Weeds, earth, railroad ties and broken concrete were deposited in an existing area marked 'trash and piles of conc.' (concrete) in Figure 1. Seeding and mulching with hay stabilized piles of soil created by this operation.

After clearing an area, the contractor then imported quarry process stone from a commercial quarry as required to fill any low areas and support the paving. The fill and existing suitable soil were graded and compacted to provide positive drainage.

After grading and compacting, the contractor paved an area with a minimum of three inches of asphalt concrete, stabilized base, mix I-2. The base was compacted, and traffic was excluded from newly paved areas to allow the base to harden. After hardening overnight, the paved area was opened to traffic.

During the paving, the property owner decided to pave a larger area than was originally proposed. The as built plan in Figure 1 shows the actual extent of the paving.

2.5 ABLE METRO PARKING LOT

During the work, it became necessary to determine if a parking area in the southeast portion of the site, known as the Able Metro parking area, should be paved or fenced. An adjoining area, formerly used by Brunswick Roofing, was also in question. Therefore, in response to DSC of Newark's request, Oxford Environmental prepared a sampling and analysis plan. EPA approved the plan on August 1, 1997.

Twelve samples, spaced approximately 75 feet apart, were collected. Results indicated levels of PCBs that were similar to other results displayed at the site. Therefore, it was decided to pave the Able Metro parking area, but to keep the Brunswick Roofing area fenced. Seeding and mulching stabilized any disturbed soil at the Brunswick Roofing area. A fence between the Brunswick Paving and Able Metro parking lots was also repaired.

2.6 FENCING

In order to restrict access to areas of known contamination, six-foot high chain link fence was erected at the boundary to the areas of PCB contamination. Lockable gates were provided where access was necessary.

During the course of the work, it became clear that installation of the fence as originally planned was not practical, since access for installation of the fence would have to interfere with a railroad line. Therefore, in an August 14, 1997 letter, EPA approved modification of the fence line. The fence east of Bound Brook was eliminated. The fence along the area of the wooded swamp was extended to Bound Brook. Bound Brook itself was considered a natural barrier to site entry.

In addition to the six-foot high chain link fence, certain grassed areas near the industrial park are restricted. These areas were covered with topsoil and seeded. They were subsequently surrounded with four-foot high snow fence. Warning signs indicating a hazardous site and that the property contained hazardous materials were posted along each fence or approximately every 100 feet along long fences.

2.7 MAINTENANCE OF INSTALLED SYSTEMS

An operations and maintenance (O&M) program was instituted. An O&M logbook was provided to the property owner's superintendent on site. The log book covers daily inspections, noting any deficiencies or system failures, and documenting any maintenance performed on the installed system to ensure the integrity and system performance. The logbook is maintained on site and may be inspected by the U.S. EPA and its representatives.

2.8 DUST CONTROL

Contaminated material was kept wet to avoid fugitive dust. A dust meter was used to monitor and adjust activities in accordance with the health and safety plan. During the course of the work, it was necessary to modify the plan. Due to the amount of dust generated by dumping quarry process stone and stabilized base, the action level for dust was exceeded. However, because the aggregate and stabilized base were not contaminated with PCBs, the action level for dust was not appropriate. Therefore, the action level was not applied to these activities.

2.9 SOIL EROSION AND SEDIMENT CONTROL

Not all areas of the industrial park were covered with paving. Many areas were covered with topsoil and seeded for permanent vegetative cover. Topsoil was applied three inches thick and the area was surrounded by snow fence to prevent pedestrian traffic. Warning signs were also posted.

Silt fence was installed at the downhill edge of slopes, to contain any soil erosion. During the course of the work, it became necessary to reroute the silt fence, in order to contain as much potentially contaminated silt as possible. The actual location of silt fence is shown on the as-built layout, Figure 1.

Storm outlets near Bound Brook were protected with silt fence and hay bales before beginning construction. Gravel dams were also installed where necessary to prevent erosion of slopes at the storm outlets. Figure 1 shows the locations.

2.10 DRAINAGE

Overall, existing drainage patterns at the site were maintained. Most of the property is drained by sheet flow. Asphalt curbing was installed at the rear of the industrial park to direct drainage to gravel dams and haybales. These outlets, located at low spots, retain silt and sediment while allowing rainwater to discharge.

Two areas were covered with 1 1/2 inch clean stone. One area has a low spot where water collects and must be pumped. At this location, a small sump and pump were installed. A pipe was installed beneath the paving to allow the pumped flow to drain. Figure 1 shows the location.

2.11 CONTAMINATION DISCOVERY AND DRUM REMOVAL

During clearing for installation of silt and chain link fence, what appears to be a landfill bordering the wetlands in the eastern portion of the site was discovered. EPA subsequently ordered removal of non-empty drums that were discovered. Also ordered was removal of non-empty drums at the former Brunswick Roofing area. Subsequently, a drum sampling and removal plan was prepared, approved (by EPA on October7, 1997) and implemented. The drums were overpacked as necessary and staged in one location in the former Pepe's Truck Driving School area. Also included were the drums of personal protective equipment generated by the work on site.

Fourteen drums were sampled and analyzed for RCRA characteristics, full TCLP and PCBs. Results, reported in a November 11, 1997, letter from Environmental Safety and Compliance Corp. to DSC of Newark Enterprises, indicated that some of the drums contained PCBs. Consequently, PCB containing drums were shipped to Model City, New York on December 29, 1997. Non-PCB wastes were shipped to East Chicago, Indiana on January 16, 1998. Table 2 lists the wastes removed and their ultimate disposition.

3. EPA-APPROVED MODIFICATIONS TO THE SITE OPERATIONS PLAN

The following section provides details on modifications made to the approved Site Operations Plan. These modifications were made to address field conditions and were approved by the EPA prior to implementation.

3.1 HEALTH AND SAFETY

1. Movement of the exclusion zone was permitted, in order to accommodate occupants of the industrial park. Occupants were excluded from the zone when PCB laden dust may be generated.
2. Joe Lockwood, Environmental Safety and Compliance Corp., replaced Kelly Walton, Tiger Environmental, as health and safety officer.
3. Safety goggles were not required if there was no impact hazard.
4. Dust generated by the dumping of asphalt mix into the paving machine was not subject to the 2.5 milligram per cubic meter limit for PCB laden dust, since the paving mix and the quarry process aggregate did not contain PCBs.
5. Monitoring for the asphalt mix consisted of a direct reading instrument for hydrogen sulfide.

3.2 PAVING

1. Paving of areas originally planned for topsoil, seeding and snow fence was permitted.
2. Paving of Able Metro parking area was required.
3. Paving of low spots at loading docks was not required. The areas were covered with 1 ½ inch clean stone. One area required a sump pump.

3.3 FENCING

1. Fencing around the Able Metro parking area was replaced.
2. Fencing along the railroad right of way east of Bound Brook was deleted.
3. Fencing along the wooded swamp was added. Fencing along Factory Street east of Bound Brook was deleted.

3.4 SOIL EROSION AND SEDIMENT CONTROL

1. Silt fence along the top of the slope east of the site was relocated to the bottom of the slope due to the discovery of what appears to be a landfill adjacent to the wetlands.
2. Seeding and mulching stabilized soil that was exposed by clearing for silt fence.
3. Soil piles from clearing for paving were stabilized by seeding and mulching.
4. An area of black, fine powder discovered during clearing for silt fence was covered with topsoil, seeded and mulched.

3.5 DRUM REMOVAL

1. Drums discovered during clearing for installing silt fence were staged, sampled and disposed in accordance with applicable rules and regulations.
2. Drums discovered in Brunswick Roofing area were staged, sampled and disposed in accordance with applicable rules and regulations.
3. Drums of personal protective equipment were staged, sampled and disposed in accordance with applicable rules and regulations.

4. CONCLUSIONS

The Cornell-Dubilier site has been stabilized in accordance with the approved Site Operations Plan. Unpaved parking areas and driveways have been paved. Fences have been erected and warning signs have been posted. Soil erosion has been controlled. Drums discovered during construction have been removed.

The above activities have been completed in accordance with the EPA approved Site Operations Plan for this facility. In addition, the submission of this report completes the final requirement of the EPA Administrative Order (excluding subparagraph VII.C.1(d)) issued to DSC. As such, Oxford, on behalf of our client DSC, requests that EPA issue a Notice of Completion relating to this Order.

TABLE 1

LIST OF CONTRACTORS AND SUBCONTRACTORS

Contractor or Subcontractor	Role
Oxford Environmental 43 Route 46 East Pine Brook, NJ 07058 Tel. (973) 244-0600 Fax (973) 244-0722 Contact: John Hendry	Environmental consultant, designer of stabilization for DSC of Newark Enterprises (property owner). Also installed pre-construction erosion controls.
Lord Anderson Worrell and Barnett 651 High Street Burlington, NJ 08016 Tel. 609-387-2800 Contact: Gordon Lehner	Subcontractor to Oxford Environmental. Surveyor
Bellamy Brothers Paving 316 Fairview Avenue Middlesex, NJ 08846 Tel. (732) 868-0928 Fax none Contact: Joe Bellamy	Contractor, builder of stabilization for DSC of Newark Enterprises
Collucci Paving	Paving machine and roller operator, subcontractor to Bellamy Brothers
Tiger Construction	Bulldozer operator, subcontractor to Bellamy Brothers
Environmental and Safety Compliance Corp. 465 Sydney Road Piscataway, NJ 08854 Tel. (732) 465- 9777 Fax (732) 465-9778 Contact: Joe Lockwood	Health and Safety Officer, Drum Sampling and Disposal for DSC of Newark Enterprises

Contractor or Subcontractor	Role
Tiger Environmental 70 Clinton Avenue Newark, NJ 07114 Tel. (973) 242-4858 Fax (973) 622-7796 Contact: Kelly Walton	Health and Safety Officer, subcontractor to Oxford Environmental
Chemtech 110 Route 4 Englewood, NJ 07631 Tel. (201) 567-6868 Fax (201) 567-1333 Contact: Emanuel Hedvat	Laboratory, subcontractor to Oxford Environmental and Environmental Safety and Compliance
Anchor Fence of South Jersey 3071 Route 73 P.O. Box 627 Maple Shade, NJ 08052 Tel. 1-800-528-7082 Fax (609) 779-0879 Contact: Rich Paterno	Fence builder, subcontractor to Bellamy Brothers Paving

TABLE 2

LIST OF MATERIALS HANDLED ON SITE OR REMOVED FOR OFFSITE TREATMENT OR DISPOSAL

Quantity	Type of Material	Ultimate Destination
5- 55 gal. Drums	Personal protective equipment. PCB contamination.	CWM Chemical Services, Inc. 1550 Balmer Road Model City, New York 14107
3- 85 gal. Drums	Overpack of 55 gal. Drums of Roofing Tar from former Brunswick Roofing area	Pollution Control Industries of Indiana 4343 Kennedy Avenue East Chicago, IN 46312
2-85 gal. Drums	Overpack of 55 gal. Drums. PCB contamination. From former Brunswick Roofing area.	CWM Chemical Services, Inc. 1550 Balmer Road Model City, New York 14107
1-85 gal. Drum	Overpack of 55 gal. Drum pieces. PCB contamination. From Toe of slope near wetlands.	CWM Chemical Services, Inc. 1550 Balmer Road Model City, New York 14107
2- 55 gal. Drums	Remains from broken drum of petroleum jelly.	Pollution Control Industries of Indiana 4343 Kennedy Avenue East Chicago, IN 46312
1-85 gal. drum	Overpack of 55 gal. Drum. From toe of slope near wetlands	Pollution Control Industries of Indiana 4343 Kennedy Avenue East Chicago, IN 46312

TABLE 3

SUMMARY OF ACTUAL COSTS

Item	Cost
Quarry Process Stone	$13,708.57
Stabilized Base, Mix I-2	$92,690.54
1 1/2" Clean Stone	$554.74
Health and Safety	$2,744.00
Drum Sampling	$4,449.20
Drum Disposal	$4,603.34
Paving and Fencing	$185,442.39
Consulting	$49,865.00
Safety Signs	$216.15
Electricity	$220.04
Legal Fees	$8,292.86
Medical testing	$328.00
Weldon Concrete	$28,140.52
Total	**$391,255.35**

Note:

Cost of labor for DSC of Newark and loss of rent revenue not included.